



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 10, 2019

BY ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Uzair Paracha*, 03 Cr. 1197 (SHS)

Dear Judge Stein:

The Government respectfully writes in response to the Court's August 29, 2019 order requiring the Government to submit a status report on or about the first, tenth, and twentieth of each month, describing: "(1) what has happened in terms of production since the last status report; (2) how many people are working on reviewing documents; (3) how many documents have been turned over to the defense to date; (4) how many documents have been turned over to the defense since the last report; (5) and what the government's projection is as to future production dates and materials." Dkt. 159.

As the Court is aware, in order to meet its disclosure obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), *Giglio v. United States*, 405 U.S. 150, 154 (1972), and their progeny, as well as 18 U.S.C. § 3500, the Government must undertake a review of an extraordinarily large quantity of classified documents (the "Classified Documents") that do not belong to the Department of Justice and that may be reviewed only at an out-of-state location. Prior to the last conference in this case, one Government attorney had participated in review of the Classified Documents at that location for approximately ten days' total. Since the Court's last order, six Government attorneys have participated in approximately six, three, one, one, one, and one days' worth of review of the Classified documents.¹ The Government expects that a rotating team of approximately eight attorneys, including five from this Office and three from the Department of Justice's National Security Division, will participate in the review in the weeks to come. In total, approximately 445 of the Classified Documents have been reviewed. Although the Government has not received a final tally of the full universe of Classified Documents, the Government currently estimates a total of approximately 14,000² documents.

¹ Due to the nature of the documents, as new attorneys participate in the review, they are required to undergo certain additional clearances, accounting for some of the delay in starting the process.

² That number is lower than the estimate previously provided to the Court, as a result of a deduplication process recently run on the documents.

cc: Joshua Dratel, Esq. (by ECF)
Ramzi Kassem, Esq. (by ECF)